

In response to Alltel's ex parte notice of its December 13, 2001 meeting with Mr. Paul Margie in Commissioner Copps' office, we on behalf of Petroleum Communications, Inc. respectfully refer the Commission staff to our December 14, 2001 ex parte letter that addresses the signal strength issue. Our letter establishes the reasons why, as a matter of law, the status quo rule gives the Gulf carriers a 39 dbu signal strength at the coastline boundary. It also summarizes the reasons why the new rule the Commission adopts in this proceeding should reduce the Gulf carriers' signal strength to 32 dbu, so it is equal to the signal strength land carriers have at the boundary. A copy of this comment is being e-mailed to Mr. Margie.

By: Richard S. Myers  
Myers Lazrus Technology Law Group  
1990 M Street, NW, Suite 200  
Washington, DC 20036  
(202) 296-0626